

# **EXHIBIT A**

DEFENDANTS' AFFIRMATIVE DESIGNATIONS FOR ELIZABETH GARCIA						
DEPO DATE	DEFENDANTS' AFFIRMATIVE DESIGNATIONS					
	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at	Notes
12/14/2018	ABDC Affirm	25	9	26	19	
12/14/2018	ABDC Affirm	46	11	47	24	
12/14/2018	ABDC Affirm	48	3	48	17	
12/14/2018	ABDC Affirm	50	20	51	11	
12/14/2018	ABDC Affirm	53	5	53	19	
12/14/2018	ABDC Affirm	53	23	54	4	
12/14/2018	ABDC Affirm	54	8	55	19	
12/14/2018	ABDC Affirm	55	22	56	9	
12/14/2018	ABDC Affirm	56	15	56	18	
12/14/2018	ABDC Affirm	56	21	57	3	
12/14/2018	ABDC Affirm	57	20	58	5	
12/14/2018	ABDC Affirm	58	8	58	24	
12/14/2018	ABDC Affirm	61	17	61	21	
12/14/2018	ABDC Affirm	61	24	62	2	
12/14/2018	ABDC Affirm	62	21	63	17	
12/14/2018	ABDC Affirm	63	22	64	2	
12/14/2018	ABDC Affirm	64	5	64	6	
12/14/2018	ABDC Affirm	64	8	64	19	
12/14/2018	ABDC Affirm	65	5	65	15	
12/14/2018	ABDC Affirm	65	24	66	4	
12/14/2018	ABDC Affirm	66	7	66	11	
12/14/2018	ABDC Affirm	66	12	67	4	
12/14/2018	ABDC Affirm	67	14	67	17	
12/14/2018	ABDC Affirm	67	18	68	1	
12/14/2018	ABDC Affirm	68	6	68	23	
12/14/2018	ABDC Affirm	69	2	69	21	
12/14/2018	ABDC Affirm	72	9	72	20	
12/14/2018	ABDC Affirm	72	23	73	12	
12/14/2018	ABDC Affirm	74	5	74	14	
12/14/2018	ABDC Affirm	76	20	77	6	
12/14/2018	ABDC Affirm	77	11	77	18	
12/14/2018	ABDC Affirm	78	10	78	24	
12/14/2018	ABDC Affirm	79	17	79	18	
12/14/2018	ABDC Affirm	79	21	79	22	
12/14/2018	ABDC Affirm	80	2	80	8	
12/14/2018	ABDC Affirm	80	15	81	19	

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	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at	Notes
12/14/2018	ABDC Affirm	82	8	82	12	
12/14/2018	ABDC Affirm	83	7	83	11	
12/14/2018	ABDC Affirm	85	12	85	20	
12/14/2018	ABDC Affirm	85	22	86	3	
12/14/2018	ABDC Affirm	86	7	86	14	
12/14/2018	ABDC Affirm	86	18	86	23	
12/14/2018	ABDC Affirm	87	2	87	11	
12/14/2018	ABDC Affirm	88	8	88	17	
12/14/2018	ABDC Affirm	88	20	89	9	
12/14/2018	ABDC Affirm	94	16	95	12	
12/14/2018	ABDC Affirm	95	15	95	23	
12/14/2018	ABDC Affirm	96	2	96	5	
12/14/2018	ABDC Affirm	96	8	96	19	
12/14/2018	ABDC Affirm	96	22	97	1	
12/14/2018	ABDC Affirm	97	5	97	7	
12/14/2018	ABDC Affirm	97	11	97	21	
12/14/2018	ABDC Affirm	97	24	98	14	
12/14/2018	ABDC Affirm	98	17	98	23	
12/14/2018	ABDC Affirm	99	2	99	4	
12/14/2018	ABDC Affirm	99	6	99	17	
12/14/2018	ABDC Affirm	99	20	99	21	
12/14/2018	ABDC Affirm	100	5	100	6	
12/14/2018	ABDC Affirm	215	2	215	11	
12/14/2018	ABDC Affirm	215	14	216	4	
12/14/2018	ABDC Affirm	217	4	217	24	
12/14/2018	ABDC Affirm	218	3	218	23	
12/14/2018	ABDC Affirm	219	2	219	8	
12/14/2018	ABDC Affirm	219	11	219	23	
12/14/2018	ABDC Affirm	220	2	220	7	
12/14/2018	ABDC Affirm	220	10	221	6	
12/14/2018	ABDC Affirm	221	9	222	2	
12/14/2018	ABDC Affirm	222	5	222	18	
12/14/2018	ABDC Affirm	222	21	223	10	
12/14/2018	ABDC Affirm	223	13	223	13	
12/14/2018	ABDC Affirm	225	6	225	11	
12/14/2018	ABDC Affirm	225	15	226	1	

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	Designation Type	Begin Page at	Begin Line at	End Page at	End Line at	Notes
12/14/2018	ABDC Affirm	226	4	226	4	
12/14/2018	ABDC Affirm	226	18	226	21	
12/14/2018	ABDC Affirm	226	24	227	11	
12/14/2018	ABDC Affirm	227	14	227	24	
12/14/2018	ABDC Affirm	228	9	228	15	
12/14/2018	ABDC Affirm	228	18	229	2	
12/14/2018	ABDC Affirm	229	5	229	10	
12/14/2018	ABDC Affirm	229	12	230	2	
12/14/2018	ABDC Affirm	248	7	250	1	
12/14/2018	ABDC Affirm	250	8	250	11	
12/14/2018	ABDC Affirm	250	14	250	18	
12/14/2018	ABDC Affirm	251	22	252	12	
12/14/2018	ABDC Affirm	252	15	252	21	
12/14/2018	ABDC Affirm	252	24	253	5	
12/14/2018	ABDC Affirm	253	8	253	9	

DEFENDANTS' RESPONSES TO PLAINTIFFS' OBJECTIONS FOR ELIZABETH GARCIA						
DEPO DATE	PLAINTIFFS' OBJECTIONS					DEFENDANTS' RESPONSES
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
12/14/2018	46	11	47	24	relevance	educational background is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	48	3	48	17	relevance	educational background is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	50	20	51	11	relevance, foundation	educational and training background is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses; witness testified to training so there is appropriate foundation
12/14/2018	53	5	53	19	relevance	witness's training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	53	23	54	4	relevance	witness's training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	54	8	55	19	relevance	witness's education and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	55	22	56	9	relevance	witness's education and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	56	15	56	18	relevance	witness's education and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	56	21	57	3	relevance	witness's education and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	57	20	58	5	relevance	witness's experience is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	58	8	58	24	relevance	witness's experience is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	61	17	61	21	relevance	witness's experience is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	61	24	62	2	relevance	witness's experience is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	62	21	63	17	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses

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DEPO DATE	PLAINTIFFS' OBJECTIONS					DEFENDANTS' RESPONSES
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
12/14/2018	63	22	64	2	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	64	5	64	6	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	64	8	64	19	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	65	5	65	15	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	65	24	66	4	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	66	7	66	11	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	66	12	67	4	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	67	14	67	17	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	67	18	68	1	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	68	6	68	23	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	69	2	69	21	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	72	9	72	20	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	72	23	73	12	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	74	5	74	14	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	76	20	77	6	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses

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DEPO DATE	PLAINTIFFS' OBJECTIONS					DEFENDANTS' RESPONSES
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
12/14/2018	77	11	77	18	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	78	10	78	24	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	79	17	79	18	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	79	21	79	22	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	80	2	80	8	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	80	15	81	19	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	82	8	82	12	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	83	7	83	11	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	85	12	85	20	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	85	22	86	3	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	86	7	86	14	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	86	18	86	23	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	87	2	87	11	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	88	8	88	17	relevance, hearsay, foundation	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses; witness's recollection is not hearsay; witness testified to training so foundation has been laid based on

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DEPO DATE	PLAINTIFFS' OBJECTIONS				DEFENDANTS' RESPONSES	
	Begin Page at	Begin Line at	End Page at	End Line at	PLAINTIFFS' OBJECTIONS	
						witness's knowledge, experience and the testimony that proceeds this section
12/14/2018	88	20	89	9	relevance, hearsay, foundation	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses; witness's recollection is not hearsay; witness testified to training so foundation has been laid based on witness's knowledge, experience and the testimony that proceeds this section
12/14/2018	94	16	95	12	relevance	witness's experience and training is relevant to witness's job duties and plaintiffs' claims and ABDC's defenses
12/14/2018	215	2	215	11	foundation	foundation has been laid based on witness's knowledge, experience, and the testimony that proceeds this section
12/14/2018	215	14	216	4	foundation	foundation has been laid based on witness's knowledge, experience, and the testimony that proceeds this section
12/14/2018	248	7	250	1	foundation	foundation has been laid based on witness's knowledge, experience, and the testimony that proceeds this section